

EXHIBIT 15

Allan J. Brenman, Ed.D.

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David Strachman
McIntyre, Tate & Lynch, LLP
321 South Main Street, Suite 400
Providence, RI 02903

November 11, 2010

Dear Mr. Strachman,

In order to write this reports I reviewed a transcript of my testimony conducted July 15, 2002 before Magistrate Judge David L. Martin, relevant parts of the decision from the case (304 F.Supp.2d 232) and the report from Eileen P. Ryan, D.O., sent to Mr. Brian Hill on October 15, 2010.

After reviewing the transcript I stand by my testimony. The major focus of my testimony was the impact of parental loss on the children – both at the time of the loss and in the future. There are hundreds of studies in the psychological literature describing the unique and required “attachment” that children make with their parents, even before they are born. This attachment to a parent is crucial for children to develop normally – emotionally, socially and intellectually. When this attachment is broken children as young as 6 months show the beginnings of grief and mourning. The research strongly describes that abrupt and permanent separation of a child from a parent, or as in this case, two parents, results in significant and often extreme emotional distress. This can include being clingy, demanding, yearning for the parents’ return, angry protest and regressive behavior. There is no doubt or controversy in the literature regarding this issue. There is no doubt in my mind that the Ungar children experienced trauma when their father and their mother were murdered.

I also spoke in my testimony about the future impact that the death of the children’s father and mother may have on them. The children carry the loss of their father with them all the time, compounded by the loss of their mother. They were emotionally injured at a very young and delicate age. As a result they have a vulnerability to loss and are more susceptible to depression and anxiety in the future. Once again, the psychological literature discusses the impact of childhood loss on later adult development and emotional functioning.

The Ungar children are being raised by their maternal grandparents. Their grandparents are significantly older than their biological parents age and therefore

the children will sustain the loss of their surrogate parents at a much younger age than they would have had their father, and mother not been murdered.

Dr. Ryan, in her report, writes about a "forensic evaluation". Dr. Ryan criticized my testimony because I did not perform a "forensic evaluation". I never purported that I had conducted an extensive evaluation. Any evaluation is merely a snap shot of what is happening on that day and can only describe the psychological, emotional and cognitive functioning of a person at that particular time.

My testimony focused on the psychological impact and trauma experienced by the children as a result of the sudden separation from their father and mother. This is very difficult to quantify, especially years after the loss. As mentioned above I also testified that as a result of the death of their father, and mother, these children are more at risk for developing psychological problems in the future.

I will be charging \$200 an hour for the preparation of this report and testimony.

Attached is a copy of my CV.

Sincerely yours,

A handwritten signature in black ink that reads "Allan J. Brenman Ed.D." The signature is written in a cursive, flowing style.

Allan J. Brenman, Ed.D.

ALLAN J. BRENNAN

Curriculum Vitae

Office Address

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Home Address

31 Capwell Avenue
Pawtucket, RI 02860

Office phone: (401) 831-5262/462-0026
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Education

Executive Masters of Business Administration (MBA), University of Rhode Island
May, 2001

Doctorate in Education, (Ed.D.), Harvard University, Cambridge, MA, 1989.
School of Education, Department of Human Development & Psychology.

Dissertation (1989): **The influence of health beliefs on eating behavior in children and adolescents.**

Qualifying Paper (1987): **Children's conceptions of health, illness and the functioning of the human body.**

Master of Education, (Ed.M.), Harvard University, Cambridge, MA, 1984.
Concentration in Interactive Media.

Bachelor of Arts, (B.A.), York University, Toronto, Ontario, 1981.
Specialized honours degree in Psychology.

Hebrew University, Jerusalem, Israel, Junior Year Abroad Program, 1978-1979.

Expert Witness - Approved as expert witness in U.S. District Court in Rhode Island, 2002.

Clinical Training and Experience

June 1999 –
Present

Clinical Consultant

RI Department of Human Services, Center for Child and Family Health, RI

Provide feedback to provider-agencies regarding clinical aspects of proposals for in-home services for children with special health care needs.

Assist in day to day management of \$15 million Medicaid program, write policies and procedures, agency certification standards and meet with providers for quality assurance. Analysis quarterly utilization data and assess program effectiveness.

February 2000 -
present

Organizational Consultant. Providence, RI

Consult to organizations regarding a variety of issues including: employee management concerns, ways to enhance personal and interpersonal

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effectiveness in the workplace, customer service, and anger management.

August 1991 -
present

Private Practice - Psychological Services, Providence, RI

Provide psychotherapy for children, adolescents, families and adults.

Areas of specialization include:

Individuals living with chronic medical conditions

Adults and children with ADHD.

Adolescents and young adults facing developmental challenges.

Children/adults experiencing grief and family loss.

Sept. 1995 -
April 1999
(Part-time)

Staff Psychologist

Bradley Hospital - Out-patient Department, Providence, RI

Conduct psychological and educational evaluations of children and adults.

Provide treatment to children and adults and their families, presenting with a wide range of psychological disorders

Consult to school personnel regarding effective strategies of educating children with learning and emotional disorders.

March 1992 -
March 1995

Support Group Leader

Hasbro Children's Hospital, Providence, RI

Led bi-weekly group for families of pediatric AIDS patients.

Roger Williams Medical Center, Providence, RI

Department of Pastoral and Psychosocial Care

Led monthly group for care-givers of cancer patients.

Co-facilitated 8-week Bereavement Group for adults.

The Tomorrow Fund, Providence, RI

Led bereavement groups for parents who lost children to cancer.

Oct. 1990 -
August 1991

Staff Psychologist/Assistant Professor (Research)

Rhode Island Hospital/Brown University Program in Medicine
Providence, RI - Department of Child and Family Psychiatry

Provided psychotherapy for children, adolescents and families.

Consulted to in-patient pediatric staff regarding concerns over children's behavior and adjustment to hospitalization.

Sept. 1989 -
August 1990

Postdoctoral Fellow in Psychiatry and Human Behavior

Rhode Island Hospital/Brown University Program in Medicine
Providence, RI - Department of Child and Family Psychiatry

Clinical responsibilities: Assessment, treatment and consultation for inpatient units and outpatient clinics treating children with medical

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and psychological problems.
On-call psychiatric coverage to pediatric emergency room.

Sept. 1988 -
August 1989

Pre-doctoral Internship in Clinical Child Psychology

Franciscan Children's Hospital & Rehabilitation Center, Boston, MA
(APA-approved) Director of Training: Richard Cowen, Ph.D.

Responsibilities included: Individual and family therapy for emotionally-troubled children.
Psychological consultation to in-patient unit staff.
Psychodiagnostic assessment of multi-problem children.
Led weekly social skills group with classroom teacher.
Psychological consultation to staff of Children with AIDS Project, Boston City Hospital, regarding behavior management problems.

Sept. 1987 -
August 1988

Psychology Intern

Dana Farber Cancer Institute, Boston, MA
Supervisors: Andrea Patenaude, Ph.D., Katherine Hewitt, Ph.D.

Provided individual and family therapy to children and adolescents with cancer.
Trained children in behavioral techniques to alleviate pain and anxiety.
Consulted to in-patient and clinic medical staff regarding patients' psychological adjustments to their illness.

Sept. 1986 -
June 1987

Psychology Practicum Student

Kennedy Day School Program, Boston, MA
Supervisor: Diana Arezzo, Ph.D.

Counseled adolescents in bi-weekly individual therapy.
Planned and led weekly "Emotional Development" group latency age children.

Nov. 1982 -
August 1983

Out-patient Worker

Thistletown Regional Centre, Rexdale, Ontario

Planned educational/behavioral programs for autistic children.
Consulted to families and teachers of autistic children on school curriculum, and behavior management techniques.

Oct. 1981 -
Nov. 1982

Psychiatric Assistant

Clarke Institute of Psychiatry, Toronto, Ontario

Provided basic care/counseling to adult psychiatric inpatients.

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Designed and implemented problem-solving and music groups.

Research Experience

Dec. 1992 - **Project Manager**

Present Multimedia Research Inc., Bellport, NY

As needed basis

Manage evaluation research studies for radio, television, videodisc programs, and educational curricula.

Conduct formative and summative studies on the appeal, attention, comprehension, effects of and attitudes towards educational media programs and curricula.

May-July 1996 **Researcher**

Goodman Research Group, Inc., Cambridge, MA

Conducted focus groups and interviews of staff and members of "City Year Rhode Island" organization and wrote report of findings.

Oct. 1990 - **Staff Psychologist/Assistant Professor (Research)**

August 1991 Rhode Island Hospital/Brown University Program in Medicine
Providence, RI

Department of Child and Family Psychiatry

Research: The impact of education on children's and adolescents' AIDS knowledge, attitudes and behaviors.

Developed and implemented health curriculum for 9th graders on decision-making, assertiveness and communication skills.

Spring 1990 **Educational Advisor**

Scholastic Productions, New York, NY

Consulted with writers on the script for "Magic School Bus", a television program for children.

Fall 1989 **Research Consultant**

Family Life/Sex Education Project, Providence, RI

Conducted focus groups with adolescent boys aged 13-18.

Topics included sexuality, AIDS and relationships.

1987-1989 **Research Assistant**

Dana Farber Cancer Institute, Boston, MA

Principal Investigator: Kathy Hewitt, Ph.D.

Conducted interviews for a study of adult survivors of childhood cancer.

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Information obtained concerned health/life insurance, employment, and the psychosocial sequelae of surviving cancer.

Sept. 1986-
April 1987 **Content Director/Researcher**
TV Ontario, Toronto, Ontario

Wrote goals, objectives and content for a television health series for second to fourth-grade children.
Topics include: dental health, food/nutrition, fitness /exercise, sleep and relaxation, visiting the doctor.

Summer 1985 **Senior Researcher**
Children's Television Workshop, (CTW) New York, NY

Designed and conducted research projects on children's attitudes and comprehension of "Square One" math series.

Teaching Experience

Fall/Winter
2003-2004 **Adjunct Instructor**, New England Institute of Technology, Warwick, RI

Taught 10 week course titled, "Human Relations in the Workplace."

Fall 1998 **Faculty**, Brown University School of Medicine, Providence, Rhode Island

Co-taught semester course in "Medical Interviewing" for first-year medical students.

Fall/Spring
1984-1986 **Teaching Fellow**
Harvard Graduate School of Education

Courses: Television and the Developing Child, Formative Evaluation, and Instructional Design of New Technologies

Scholarships and Awards

Canada Council Award - Doctoral Fellowship - 1985-1988
Harvard University - Larsen Fellowship - 1984-1987
York University - Scholarship for academic achievement - 1980
Ontario Scholar's Award - 1977

Professional Licenses and Registrations

State of Rhode Island - Department of Health - June, 1990
Licensed Psychologist Number PS 410

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Organization Affiliations

Board member - Bureau of Jewish Education, Providence, RI 1994-2001

Courses and Skills

Introductory Hypnosis and Hypnotherapy - Dr. Daniel Brown, The Cambridge Hospital.
Workshop on the Rorschach Inkblot Test - Exner system.
Week course in Behavioral Medicine - Dr. Herbert Benson, Beth Israel Hospital.
Treating Couples and their Families - Cambridge Hospital, 1991.
Private lessons in classical piano and musical theory.
Divorce Mediation - 40-hour course given by Roger Williams University, April 1995.

University Appointments

Clinical Assistant Professor, Department of Psychiatry, Brown University. 1999-2004

Peer Review Journals

Guest reviewer, AIDS Education and Prevention, An Interdisciplinary Journal.
Guest reviewer, The Psycho-Oncology Journal.

Publications

Brown, L., Etemad, J., Brenman, A. and Dwight, S. Child Psychiatry and AIDS: A Survey, *American Journal of Child and Adolescent Psychiatry*, Vol. 30, Number 5, September, 1991.

Brown, L., Reynolds, L. & Brenman, A. Out of Focus: Children's Conceptions of AIDS, *Health Education*, Vol. 25, Number 4, July/August, 1994.

Sunwoo, J., Brenman, A., Escobedo, J., Philpott, T., Allman, K., Mueller, J., Jaeger, J., Brown, L. & Cole, F. Effective, Low cost School-based AIDS Education for Adolescents. *Journal of Adolescent Health*. Vol. 16, No. 4, April, 1995.

Brenman, A.J., Brown, L.K. & Nagler, J. *An Evaluation of HIV Education in Fifth Grade*. Manuscript submitted for publication.

Wagner, E.F., Brown, L.K. & Brenman, A.J. Considering Individual Differences in the Design of Preventive Interventions: HIV Primary Prevention as an Example. *The Journal of Primary Prevention*, Vol 16, No. 2, 1995.

Conference Presentations

Brown, L., Brenman, A. (August, 1990). "*Kids say the darnedest things*": Focus groups about AIDS. Paper presented at the meeting of the IV International

Conference on AIDS Education, Puerto Rico.

Brenman, A. (October, 1990). *Adolescent risk-taking and condom use*. Paper presented at the meeting of the American Academy of Child & Adolescent Psychiatry, Chicago, Illinois.

Brenman, A. (January, 1991). *Impact of pediatric cancer on the psychosocial development of the child and family*. Paper presented at the Pediatric Oncology Group of Ontario (POGO) Annual Meeting, Toronto, Ontario.

Brenman, A. (April, 1991). *Medicine and education unite: The Case of AIDS*. Paper presented at the STATS Annual Report Meeting, St. Louis, Missouri.

Presentations

"Children's Understanding of Health and Illness", presented to oncology and psychosocial staff at The Hospital for Sick Children, Toronto, Ontario, Canada, June 1990.

"School Refusal and Phobia" presented to residents in Pediatrics, Rhode Island Hospital, Providence, November, 1990.

"How Children Understand AIDS: A Developmental Perspective", Psychosocial staff, Dana-Farber Cancer Institute, February, 1991.

"Behavior Management and the Child with Cancer", Candlelighter's Association monthly meeting, May, 1991.

"Communication and Problem-solving Skills", presented to Parent- Volunteer Staff, Department of Pediatric Oncology, Rhode Island Hospital, June, 1991.

"Cancer and the Psychologist: Clinical and Research Dilemmas", University of Rhode Island, Cancer Prevention Research Center, presented to graduate and undergraduate students in a Health Psychology course, November, 1992.

"Helping Children Cope with Family Illness", The Hope Center for Life Enhancement, October, 1995/November 1996.

"Managing Difficult Behavior", Bradley Hospital's Speaking of Children Lecture Series, Somerset Middle School, November, 1995.

"Turn Your Child into a TV Critic", Bradley Hospital Speaker's series, June, 1996, Speaking of Children Conference, Somerset Middle School, November, 1996, 1998 Parenting Matters Conference, April, 1997, 1998.

References available upon request.